Robinson+Cole

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May 1, 2023

VIA ECF

Hon. Ronnie Abrams United States District Judge Thurgood Marshall United States Courthouse 40 Foley Square New York, NY 10007

Re: Estate of Charles T. Close v. Cigna Health and Life Insurance Corporation Case No. 1:22-cv-07449-RA

Dear Judge Abrams:

This office represents Defendant Cigna Health and Life Insurance Company ("Cigna") in the above-referenced matter. We write with the consent of Plaintiff's counsel to request an extension of time for Cigna to respond to Plaintiff's Motion to Dismiss Cigna's Counterclaim to and including June 5, 2023.

Pursuant to this Court's Order of March 22, 2023, Plaintiff filed a Motion to Dismiss Cigna's Counterclaim on April 20, 2023. Pursuant to Local Rule 6.1(b), Cigna's response currently is due May 4, 2023.

Due to preexisting conflicts, including a medical procedure that I will undergo on May 4, 2023, we respectfully request a 30-day extension for Cigna's response. Plaintiff's counsel has graciously consented to this request for an extension, and has requested until June 30, 2023 in which to file his Reply on behalf of Plaintiff.

Accordingly, Cigna respectfully requests that the Court grant this unopposed request and permit the following schedule with respect to Plaintiff's Motion to Dismiss Cigna's Counterclaim:

• Cigna's Opposition to Plaintiff's Motion to Dismiss Counterclaim – June 5, 2023

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> Plaintiff's Reply Brief in Support of Its Motion to Dismiss Counterclaim – June 30, 2023.

We greatly appreciate your attention to this matter.

Respectfully submitted,

Katherine M. Katchen

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cc: All Counsel of Record (via ECF)

Application granted.

SO ORDERED.

Hon. Ronnie Abrams

5/2/2023